



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

U.S. ENVIRONMENTAL PROTECTION AGENCY
\$250,000 EMERGENCY ACTION MEMO / INITIAL POLLUTION REPORT

DATE: May 2, 2012.

SUBJECT: NOTIFICATION OF \$250,000 ACTIVATION
Klouda Estate Site
Fort Valley GA

FROM: Carter Williamson
FOSC, Emergency Response and Removal Branch

TO: Regional Emergency Operation Center, 4WD-ERRB
Shane Hitchcock, ERRB
Jim Webster, ERRB
Site File

I. PURPOSE

The purpose of this memorandum is to document the decision to initiate emergency response actions described herein for the Klouda Estate Site (the "Site") located in Fort Valley, Peach County, Georgia pursuant to the On-Scene Coordinator's delegated authority under CERCLA Section 104.

II. SITE INFORMATION AND BACKGROUND

Site Name:	Klouda Estate Site
Superfund Site ID (SSID):	B4Q8
CERCLIS Number:	GAN000410823
TO Amount:	\$95,000
TO Number:	TBD
NPL Status:	Non-NPL
Removal Start Date:	April 30, 2012

A. Incident Category:

Agricultural site and former site of crop dusting operation

B. Site Location

1. Site Description

a. Removal Site Evaluation

It is believed that pesticide formulation mixing, application tank washing and application tank dumping occurred at the Site. The Site was listed on the Georgia Hazardous Site Inventory on November 10, 2005 in response to a release notification submitted to Georgia Environmental Protection Division (GAEPD) by the Estate Charles Joseph Klouda. Since 2005 the Estate has installed monitoring wells and conducted several sampling events including soil sampling in 2005 and groundwater sampling in 2011. In January 2012 the Georgia Environmental Protection Division (GEPD) conducted sampling and analysis of wells used as the primary source of drinking water for several nearby residences.

Soil sampling results collected in 2005 indicate that toxaphene concentrations in top soil are as high as 31 times the U.S. Environmental Protection Agency's (EPA's) removal action level (RAL) for industrial soil (5321 mg/Kg) and soil contamination above the RAL extends as far as 8 feet beneath the top soil. 2011 results from monitoring well samples located within 100 feet of residential drinking water wells are 7 times the toxaphene RAL for tap water.

Residential well samples collected in 2012 by GAEPD exceeded the maximum contaminant level (MCL) for Lindane in two drinking water wells and was detected in two others; however, the results were below EPA's residents' tapwater action levels. These wells serve as the primary drinking water source for one residence on Fullwood Road. The home owners supplied themselves with bottled water at the states recommendation.

On January 30, 2012, GA EPD referred the site to the U.S. EPA for consideration of a time-critical removal action or other response action as appropriate. On March 1, 2012 OSC's Tim Neal and Brian Englert mobilized to conduct an initial site reconnaissance and to begin a removal site evaluation (RSE) of the Site. The initial site visit revealed drums containing investigation derived wastes (IDW) near the site monitoring wells as well as several additional open wells on the property. Soil boring locations from the 2005 sampling event were still clearly marked. Subsequent to this visit EPA contacted the Site owner as well as the owners to adjacent residential properties and obtained access to the properties.

On April 11 and April 12, 2012, EPA, with assistance from START, collected additional samples on the Site and from the surrounding residential wells. Soils were sampled at 0 to 6 inches and 18 to 24 inches in depth on the Site and drinking water wells immediately to the east and south of the Site were sampled. Soil and residential well samples were analyzed for TLC VOC, TCL SVOCs, TCL Pesticides, OP Pesticides, and RCRA Metals. Additionally, one soil sample was analyzed for TCLP Toxaphene and all residential well samples were analyzed for toxaphene congeners. Preliminary data suggest toxaphene levels are above the action levels in several drinking water wells and soil samples. EPA initiated an emergency response to assist the residence with bottled drinking where needed. Further actions are pending after the final validated data is received from the lab.

b. Physical location and Site characteristics

The Site is located on a 114-parcel of land east in Peach County GA. The southeast corner of the property adjoins to the intersection of GA State Highway 96 and Fullwood Road. The Site has been historically used for agricultural purposes and is currently used for commercial peach production. The approximate latitude and longitude of the site entrance are 32.5586⁰N and 83.8410⁰W.

c. Release or threatened release into the environment of a hazardous substance, pollutant or contaminant.

A former crop-dusting operation and airstrip reportedly leased a portion of the property and operated from the 1950's to the 1970's near the east-central portion of the property. The crop-dusting operation and airstrip were reportedly owned and operated by Southern Crop Services of Delray Beach, Florida. Potential pesticide formulation mixing, application tank washing and application tank dumping occurred at the Site may have occurred during this operation.

2. Description of Threat

Section 300.415 of the National Contingency Plan (NCP) lists a number of factors to be evaluated in determining the appropriateness of a removal action. Below are the factors that have been considered. Those marked with and X apply to the Site.

 X Actual or potential exposure to nearby human populations, animals or the food chain from hazardous substances or pollutants or contaminants [300.415(b)(2)(i)].

 X Actual or potential contamination of drinking water supplies or sensitive ecosystems [300.415(b)(2)(ii)].

 X Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that pose a threat of release [300.415(b)(2)(iii)].

 X High levels of hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate [300.415(b)(2)(iv)].

 X The availability of other appropriate federal or state response mechanisms to respond to the release [300.415(b)(2)(vii)].

 X Other situations or factors that may pose threats to the public health or welfare of the United States or the environment [300.415(b)(2)(viii)].

Preliminary data suggests that detected concentrations of toxaphene in drinking water wells from 4 out of five locations sampled are above the EPA Risk Management Level (RML) (1.3 µg/L) and the EPA Maximum Contaminant Level (MCL) (3.0 µg/L) for toxaphene in tap water. Detected concentrations of toxaphene in monitoring wells and in soil samples on the

Site are also above EPA action levels. While GAEPD has initially advised residents to drink bottled water, none of the houses sampled have access to city water. Currently residents are using well water for bathing. Currently other mechanisms are not available for this response. IDW is present on the site and high concentrations of toxaphene are present in the soil on site.

III. Planned Removal Activities

The following actions will be performed as part of the emergency response:

- Where not already available, EPA will provide bottled drinking water for residential homes until a municipal water connection or whole house filter can be established to each home;
- EPA will provide whole house water filters or will provide for the installation and setup of a municipal water connection to the homes, ensuring that the connections are functional and operating adequately;
- Provide for the disconnection of residential groundwater wells at each home including disconnection of pumps, tanks, pipes, etc. joined to the well water supply; abandon private wells as needed.
- Provide for the installation of a lockable valve on the well water supply line, and provide a lock for the valve;

IV. BUDGET*

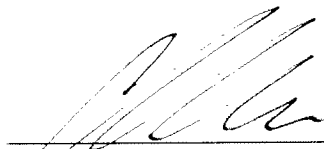
ERRS Contractor Costs	\$76,000
START Contractor Costs	\$0
Other Extramural Costs (Strike Team, other Fed Agencies)	\$0
Contingency costs (20% of subtotal)	\$19,000
Total Removal Project Ceiling	\$95,000

*EPA direct and indirect costs, although cost recoverable, do not count toward the Removal Ceiling for this removal action. Liable parties may be held financially responsible for costs incurred by the EPA as set forth in Section 107 of CERCLA. "

V. APPROVALS

This decision document represents the selected removal action for this Site, developed in accordance with CERCLA as amended, and not inconsistent with the National Contingency Plan. This decision is based on the administrative record for the Site.

Conditions at the site meet the NCP section 300.415(b) criteria for a removal action and through this document, I am approving the proposed removal actions. The total project ceiling is \$95,000, this amount will be funded from the Regional removal allowance.


Carter Williamson
Federal On-Scene Coordinator

5/4/12
Date